

AARON R. MAURICE, ESQ.
Nevada Bar No. 6412
BRITTANY WOOD, ESQ.
Nevada Bar No. 7562
ELIZABETH E. ARONSON, ESQ.
Nevada Bar No. 14472
MAURICE WOOD
8250 West Charleston Blvd., Suite 100
Las Vegas, Nevada 89117
Telephone: (702) 463-7616
Facsimile: (702) 463-6224
E-Mail: amaurice@mauricewood.com
bwood@mauricewood.com
earonson@mauricewood.com

Attorneys for Defendant,
WESTCOR LAND TITLE INSURANCE
COMPANY

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

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WELLS FARGO BANK, NATIONAL
ASSOCIATION, AS TRUSTEE FOR
MORGAN STANLEY CAPITAL I INC.
TRUST 2006-HE1, MORTGAGE
PASS-THROUGH CERTIFICATES, SERIES
2006-HE1,

Plaintiff,

vs.

WESTCOR LAND TITLE INSURANCE
COMPANY; DOE INDIVIDUALS I through X;
and ROE CORPORATIONS XI through XX,
inclusive,

Defendants.

CASE NO. 2:21-cv-00326-JCM-BNW

**STIPULATION AND ORDER TO
EXTEND TIME PERIOD TO
RESPOND TO OPPOSITION TO
MOTION TO DISMISS [ECF 13]
AND COUNTERMOTION FOR
SUMMARY JUDGMENT [ECF 14]
AND TO EXTEND PAGE LIMIT
FOR REPLY**

[First Request]

COME NOW Wells Fargo Bank, National Association, as Trustee for Morgan Stanley Capital I Inc. Trust 2006-He1, Mortgage Pass-Through Certificates, Series 2006-He1 ("Plaintiff"), and Defendant, Westcor Land Title Insurance Company ("Defendant") (collectively, the "Parties"), by and through their respective attorneys of record, and hereby stipulate and agree as follows:

1. On January 22, 2021, Plaintiff filed its Complaint in Eighth Judicial District Court, Case No. A-21-82836-C [ECF No. 1-1].

2. On February 26, 2021, Defendant filed a Petition for Removal to this Court [ECF No. 1].

3. On March 5, 2021, Defendant filed a Motion to Dismiss [ECF No. 6].

4. On April 26, 2021, Plaintiff filed its response to Defendant's Motion to Dismiss, entitled Opposition to Motion to Dismiss and Countermotion for Summary Judgment [ECF Nos. 13 and 14].

5. Because Plaintiff's response to Defendant's Motion to Dismiss included a Countermotion for Summary Judgment, the deadline for Defendant to file its Reply to Plaintiff's Opposition [ECF No. 13] is earlier than its deadline to file its Response to Plaintiff's Countermotion for Summary Judgment [ECF No. 14].

6. In accordance with FRCP 1, Defendant intends to file a single memorandum of points and authorities (filed twice to comply with local rules), to respond to ECF Nos. 13 and 14.

7. The timing of Plaintiff's filing of the Response created a scheduling conflict for Defendant's counsel due to Defendant's counsels' prior family commitments the week of May 10, 2021.

8. The parties have discussed extending the deadline for Defendant to file its Reply and Response, extending the deadline to file its Reply by four weeks and extending the deadline to file its Response by two weeks, such that the deadline for both filings would be extended to May 31, 2021.

9. The parties further stipulated that the thirty (30) page limit imposed for responses to motions for summary judgment will apply to Defendant's combined points and authorities.

10. These extensions are requested to allow counsel for Defendant additional time to review and respond to the points and authorities filed by Plaintiff while still allowing Defendant's counsel to comply with its previously planned commitments.

11. Counsel for Plaintiff does not oppose the requested extension.

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12. This is the first request for an extension which is brought in good faith and not for purposes of delay.

DATED this 30th day of April, 2021.

DATED this 30th day of April, 2021.

MAURICE WOOD

WRIGHT, FINLAY & ZAK, LLP

By: /s/ Elizabeth E. Aronson

By: /s/ Darren T. Brenner

AARON R. MAURICE, ESQ.

DARREN T. BRENNER, ESQ.

Nevada Bar No. 006412

Nevada Bar No. 8386

BRITTANY WOOD, ESQ.

LINDSAY D. ROBBINS, ESQ.

Nevada Bar No. 007562

Nevada Bar No. 13474

ELIZABETH E. ARONSON, ESQ.

7785 W. Sahara Ave, Suite 200

Nevada Bar No. 014472

Las Vegas, Nevada 89117

9525 Hillwood Drive, Suite 140

Las Vegas, Nevada 89134

Attorneys for Plaintiff

Attorneys for Defendant

IT IS SO ORDERED May 3, 2021.


UNITED STATES DISTRICT COURT JUDGE